

**BEFORE THE MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

In the Matter of

Petition of Charter Fiberlink MA-CCO, LLC
for Arbitration of an Amendment to the
Interconnection Agreement Between Verizon-
Massachusetts, Inc. and Charter Fiberlink MA-
CCO, LLC Pursuant to Section 252 of the
Communications Act of 1934, as Amended

D.T.E. Docket 06-56

Motion Requesting Confidential Treatment of Materials Filed with the Department

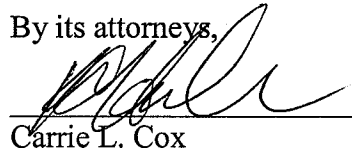
Charter Fiberlink MA-CCO, LLC ("Charter") respectfully requests that the Department treat as confidential certain materials filed under seal pursuant to the Department's applicable precedent and past practices. Charter is filing confidential material in response to the Department's Information Request 1-7, which seeks information about Charter's total costs, including labor, engineering, and other administrative costs, of building a fiber meet point in both LATAs in Massachusetts.

Charter is a competitive entrant in Massachusetts and competes with Verizon Massachusetts (the opposing party in this case) to actively obtain, and retain, telecommunications subscribers in the Commonwealth. Hence, maintaining the confidentiality of its business planning documents, cost documents, and other non-public information is critical. Release of this information would substantially harm Charter's ability to compete with Verizon and other local exchange carriers on a level playing field. Moreover, release of this information would provide highly competitively sensitive material to Verizon and thereby undermine its ability to effectively compete as local exchange and interexchange carrier in Massachusetts.

Accordingly, Charter respectfully requests that the information contained in Charter CONFIDENTIAL Response 1-7 to its response to the Department's Information Requests be filed under seal and accorded confidential treatment by the Department. Consistent with this request, Charter specifically asks that the Department maintain Charter's confidential response under seal; that such response be viewed only by the Arbitrator and Department staff actively participating in the above-referenced proceeding; and, that such information not be released to the public, other Department staff, or any other entity under any circumstance. Charter further requests that this confidential response be maintained by the Department only for the length of this proceeding, and at the close of this proceeding that the Department return or destroy the confidential materials referenced herein.

Charter Fiberlink MA-CCO, LLC

By its attorneys,



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Dated: August 28, 2006

CERTIFICATE OF SERVICE

I, Debra Sloan, hereby certify that on August 28, 2006, I served a true and correct copy of the foregoing *Motion Requesting Confidential Treatment of Materials Filed with the Department* via Federal Express and electronic copy upon the following:

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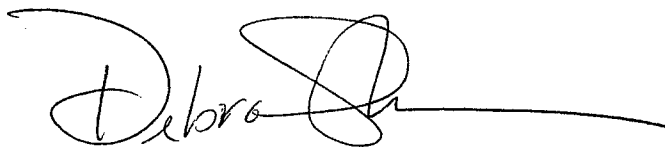
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A handwritten signature in black ink, appearing to read 'Debra Sloan', with a long horizontal line extending to the right.

Debra Sloan